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Page 1
 1
             IN THE UNITED STATES DISTRICT COURT
         FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
 2
 3
 4
     THE CITY OF HUNTINGTON,
 5
                Plaintiff,
 6
                                         CIVIL ACTION
     vs.
 7
                                       NO. 3:17-01362
     AMERISOURCEBERGEN DRUG
 8
     CORPORATION, et al.,
 9
                Defendants.
10
11
     CABELL COUNTY COMMISSION,
12
                 Plaintiff,
13
     vs.
                                              CIVIL ACTION
                                            NO. 3:17-01665
14
     AMERISOURCEBERGEN DRUG
     CORPORATION, et al.,
15
                 Defendants.
16
17
18
               Videotaped and videoconference deposition
19
     of DR. STEPHEN PETRANY taken by the Defendants
     under the Federal Rules of Civil Procedure in the
20
     above-entitled action, pursuant to notice, before
21
     Teresa S. Evans, a Registered Merit Reporter,
     everyone located remotely, on the 6th day of
2.2
     August, 2020.
23
2.4
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www.veritext.com
888-391-3376

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1 APPEARANCES: 2	1 EXAMINATION INDEX	
APPEARING FOR THE PLAINTIFFS: 3	2	
Paul T. Farrell, Jr., Esquire (via Zoom)	3 EXAMINATION INDEX	
4 FARRELL LAW 422 Ninth Street	4	
5 3rd Floor	5 BY MR. RUBY	11
Huntington, WV 25714-1180	6 BY MR. FARRELL	166
Amy J. Quezon, Esquire (via Zoom)	7 BY MR. RUBY	181
7 McHUGH FULLER LAW GROUP 97 Elias Whiddon Road	8	
8 Hattiesburg, MS 39402 9 Anne McGinness Kearse, Esquire (via Zoom)	9	
9 Anne McGinness Kearse, Esquire (via Zoom) MOTLEY RICE	10	
10 28 Bridgeside Boulevard		
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12 APPEARING FOR THE DEFENDANT CARDINAL HEALTH: 13 Danielle Sochaczevski, Esquire (via Zoom)	12	
Suzanne Salgado, Esquire	13	
14 WILLIAMS & CONNOLLY 725 Twelfth Street, N.W.	14	
15 Washington, DC 20005	15	
16 Steven R. Ruby, Esquire (via Zoom) CAREY, DOUGLAS, KESSLER & RUBY	16	
17 901 Chase Tower	17	
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19 APPEARING FOR THE DEFENDANT AMERISOURCEBERGEN:	19	
20 APPEARING FOR THE DEFENDANT AMERISOURCEBERGEN:	20	
Alyssa F. Conn, Esquire 21 REED SMITH	21	
Three Logan Square	22	
22 1717 Arch Street, Suite 3100 Philadelphia, PA, 19103	23	
23	24	
24	24	
Page 3	1 EXHIBIT INDEX	Page 5
1 APPEARANCES (Contd.): 2	2 Exhibit 10 America Magazine article "The 195	
APPEARING ON BEHALF OF THE DEPONENT AS FACULTY	3 opioid crisis demands a new	
3 MEMBER OF MARSHALL UNIVERSITY AND AS AN EMPLOYEE OF	solution. Churches are 4 hoping to be a part of it"	
UNIVERSITY PHYSICIANS & SURGEONS:	dated 5-21-19	
4	Exhibit 19 E-mail from Petrany to Adkins 78	
Joel P. Jones, Jr., Esquire 5 CAMPBELL WOODS	6 and various other recipients	
	Re: Comprehensive plan to	
	7 address the impact of the	
1002 Third Avenue 6 Huntington, WV 25701	7 address the impact of the opioid crisis dated 3-5-19	
1002 Third Avenue	7 address the impact of the opioid crisis dated 3-5-19 8 Exhibit 20 E-mail chain between Petrany 90 9 and Williams Re: Comprehensive	
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- 1 in that sense.
- Q. The ideas that are embodied in these
- 3 attachments which Ms. Maiolo refers to as drafts,
- 4 these emerged from discussions among you and your
- 5 staff; is that right?
- 6 A. I -- you'd have to ask her where she got
- 7 the ideas that she put down here. Certainly some
- 8 of it -- some of that -- that is true of some of
- 9 it.
- 10 Q. Okay. Could you turn to the page that ends
- 11 in 77?
- 12 A. Okay.
- 13 Q. Do you see the second -- well, this is --
- 14 first of all, this page is titled "Introduction."
- 15 Is that right?
- 16 A. Yes.
- 17 Q. Do you see the second paragraph that begins
- 18 with "A myriad" --
- 19 A. Yes.
- 20 Q. This says, "A myriad of factors have
- 21 contributed to this priority issue in this
- 22 Appalachian region, specifically in the city of
- 23 Huntington. In the years leading up to the peak of
- 24 substance use, West Virginia workers experienced a
 - Page 155
- 1 period of high unemployment due to economic
- 2 downturn and the shutdown of many of the
- 3 highest-employing coal mines."
- 4 Do you see that?
- 5 A. Yes.
- 6 Q. Do you believe that high unemployment in
- 7 West Virginia has contributed to substance abuse in
- 8 Cabell County?
- 9 MR. JONES: Objection. He's not here
- 10 as an expert witness; he's here as a fact witness.
- MR. RUBY: And I'm just asking for his
- 12 opinion as someone who led the development of this
- 13 plan.
- 14 A. I mean, what -- I mean, if -- okay, so what
- 15 -- what's the question? What are you asking me?
- 16 Do I believe that sentence? I didn't write that
- 17 sentence. Jodi wrote that sentence.
- 18 Has un -- does unemployment contribute
- 19 to substance abuse? High unemployment contribute
- 20 to substance abuse? I think that's generally -- a
- 21 generally-accepted concept.
- Q. And do you agree with that personally?
- A. I mean, I wouldn't argue with it.
- 24 Q. The next sentence says, "The West Virginia

1 education system is one of the lowest in the

- 2 country, contributing to the inability for these
- 3 workers to find new jobs."
- 4 Do you agree that West Virginia's
- 5 education system contributes to the substance abuse
- 6 problem in Cabell County?
- A. I wouldn't say that that way, no. I would
- 8 not answer your question that way.
- 9 Q. Do you agree that West Virginia's education
- 10 system contributes to the inability of workers in
- 11 West Virginia to find new jobs?
- 12 A. I would not phrase it that way, no. And
- 13 that -- I don't know that that's -- that ended up
- 14 in -- I do not believe that that sentence ended up
- 15 in our final draft.
- 16 Q. Do you think that West Virginia's education
- 17 system has any role or plays any role in the
- 18 substance abuse problem that exists here?
- 19 A. I think the education system has an
- 20 opportunity to help solve the problem, absolutely.
- 21 Q. If you continue on in the paragraph,
- 22 Doctor, there's a sentence that begins, "In a
- 23 region largely made up." Do you see that?
- 24 A. Yes.

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- Q. It says, "In a region largely made up of
- 2 blue collar workers, the injury rate is higher than
- 3 more populated areas."
- 4 Let me ask two questions about this
- 5 sentence. First of all, do you agree with the
- 6 statement that's made here?
- 7 A. I don't have the statistics to prove it or
- 8 demonstrate it, so I can't answer that. I don't
- 9 know.
- 10 Q. So you don't -- you don't know if this is
- 11 true or not.
- 12 A. I could -- I can make a -- I can make a
- 13 educated guess about it, but I don't have
- 14 statistics that justify -- or data, to support that
- 15 statement. It may well be true, but I don't have
- 16 knowledge of data to support it or not support it.
- 17 Q. Have you observed, in your clinical
- 18 practice, that there are many blue collar workers
- 19 in the Cabell County region?
- 20 A. I have a small practice. I have some blue
- 21 collar workers; I have some that are white collar
- 22 workers; and I have a good deal of patients who
- 23 have -- who are unemployed or uninsured and poor.
- Q. Would you agree that the injury rate among

Page 322	Page 324
1 MS. KEARSE: Thank you, Doctor	1
2 Petrany.	STATE OF WEST VIRGINIA 2
3 VIDEO OPERATOR: We are off the record	COUNTY OF KANAWHA, to wit;
4 at 5:16 p.m., and this concludes the testimony	I, Teresa Evans, owner of Realtime Reporters,
5 given by Stephen M. Petrany, M.D. The total number	LLC, do hereby certify that the attached deposition
6 of media units used was eight, and will be retained	5 transcript of DR. STEPHEN PETRANY meets the
7 by Veritext.	6
8 (Having indicated he would like to 9 read his deposition before filing,	requirements set forth within article twenty-seven, 7
further this deponent saith not.)	chapter forty-seven of the West Virginia Code to
11	the best of my ability.
12oOo	9 10
13	Given under my hand this 10th day of August,
14	2020.
15	12 13
16	14
17	15 Ny Computsion 16 Siven under my hand th:
18	17 registere i recessional
19	Reporter/Certified Realtime Reporter
20 21	18
22	20 21
23	22
24	23 24
Page 323	Page 325
1 STATE OF WEST VIRGINIA, 2 COUNTY OF KANAWHA, to wit;	1 Veritext Legal Solutions 1100 Superior Ave
3	2 Suite 1820
4 I, Teresa S. Evans, a Notary Public within and for the County and State aforesaid, duly	Cleveland, Ohio 44114 3 Phone: 216-523-1313
5 commissioned and qualified, do hereby certify that the foregoing deposition of DR. STEPHEN PETRANY was	4 August 11, 2020
6 duly taken by me and before me at the time and place and for the purpose specified in the caption	5
7 hereof, the said witness having been by me first	To: Joel P. Jones, Jr., Esquire
duly swom.	Case Name: City Of Huntington v. Amerisourcebergen Drug Corporation 7
I do further certify that the said 9 deposition was correctly taken by me in shorthand	Veritext Reference Number: 4208115
notes, and that the same were accurately written 10 out in full and reduced to typewriting and that the	Witness: Dr. Stephen Petrany Deposition Date: 8/6/2020
witness did request to read his transcript.	9 10 Dear Sir/Madam:
I further certify that I am neither	11
12 attorney or counsel for, nor related to or employed by, any of the parties to the action in which this	Enclosed please find a deposition transcript. Please have the witness 12
by, any of the parties to the action in which this 13 deposition is taken, and further that I am not a	Enclosed please find a deposition transcript. Please have the witness 12 review the transcript and note any changes or corrections on the 13
by, any of the parties to the action in which this 13 deposition is taken, and further that I am not a relative or employee of any attorney or counsel 14 employed by the parties or financially interested	Enclosed please find a deposition transcript. Please have the witness 12 review the transcript and note any changes or corrections on the
by, any of the parties to the action in which this 13 deposition is taken, and further that I am not a relative or employee of any attorney or counsel 14 employed by the parties or financially interested in the action and that the attached transcript 15 meets the requirements set forth within article	Enclosed please find a deposition transcript. Please have the witness 12 review the transcript and note any changes or corrections on the 13 included errata sheet, indicating the page, line number, change, and 14 the reason for the change. Have the witness' signature notarized and
by, any of the parties to the action in which this 13 deposition is taken, and further that I am not a relative or employee of any attorney or counsel 14 employed by the parties or financially interested in the action and that the attached transcript 15 meets the requirements set forth within article twenty-seven, chapter forty-seven of the West 16 Virginia Code.	Enclosed please find a deposition transcript. Please have the witness 12 review the transcript and note any changes or corrections on the 13 included errata sheet, indicating the page, line number, change, and 14 the reason for the change. Have the witness' signature notarized and 15 forward the completed page(s) back to us at the Production address
by, any of the parties to the action in which this 13 deposition is taken, and further that I am not a relative or employee of any attorney or counsel 14 employed by the parties or financially interested in the action and that the attached transcript 15 meets the requirements set forth within article twenty-seven, chapter forty-seven of the West	Enclosed please find a deposition transcript. Please have the witness 12 review the transcript and note any changes or corrections on the 13 included errata sheet, indicating the page, line number, change, and 14 the reason for the change. Have the witness' signature notarized and 15
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82 (Pages 322 - 325)